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7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 TRAVIS NUTSCH, an individual,

10 Plaintiff,

11 vs.

12 LAS VEGAS METROPOLITAN POLICE  
 13 DEPARTMENT, a Municipal Corporation;  
 14 OFFICER TIMOTHY NYE, an individual;  
 15 OFFICER GEORGE AJAM, an individual;  
 16 OFFICER GENE WOLFANGER, an  
 17 individual; OFFICER KELLEY FURNAS,  
 18 an individual; OFFICER ISRAEL CRUZ  
 CAMACHO, an individual; OFFICER  
 GABRIEL LEA, an individual; DOE  
 OFFICERS III-VII, individuals

19 Defendants.

Case No.: 2:23-cv-01101-JCM-MDC

**STIPULATION AND ORDER TO  
 EXTEND DISCOVERY PLAN AND  
 SCHEDULING ORDER DEADLINES**

**(EIGHTH REQUEST)**

20 Plaintiff Travis Nutsch, by and through his respective counsel, and Defendants Las  
 21 Vegas Metropolitan Police Department, Officer Timothy Nye, Officer George Ajam, and  
 22 Officer Gene Wolfanger, Officer Kelly Furnas, Officer Isrrael Cruz Camacho, and Officer  
 23 Gabriel Lea, (“LVMPD Defendants”), by and through their respective counsel (collectively  
 24 “the Parties”), hereby stipulate and agree to extend the Discovery Plan and Scheduling Order  
 25 deadlines an additional ninety (90) days. This Stipulation is being entered in good faith and  
 26 not for purposes of delay. This is the eighth request for an extension in this matter, as the  
 27 seventh request was denied without prejudice at hearing on January 7, 2025.

28

1. **STATUS OF DISCOVERY.**

2. **A. PLAINTIFF'S DISCOVERY**

3. 1. Plaintiff's Initial Disclosures and Production of Documents Pursuant to Fed.  
4. R. Civ. P. 26.1, dated August 28, 2023.

5. 2. Plaintiff's First Set of Requests for Production to Defendant Las Vegas  
6. Metropolitan Police Department, dated October 12, 2023.

7. 3. Plaintiff's First Set of Requests for Production to Defendants Doe Officers  
8. III-VII, dated December 12, 2023.

9. 4. Plaintiff's First Set of Requests for Production to Defendant Gabriel Lea,  
10. dated December 12, 2023.

11. 5. Plaintiff's First Set of Requests for Production to Defendant Gene  
12. Wolfanger, dated December 12, 2023.

13. 6. Plaintiff's First Set of Requests for Production to Defendant George Ajam,  
14. dated December 12, 2023.

15. 7. Plaintiff's First Set of Requests for Production to Defendant Israel Cruz  
16. Camacho, dated December 12, 2023.

17. 8. Plaintiff's First Set of Requests for Production to Defendant Kelley Furnas,  
18. dated December 12, 2023.

19. 9. Plaintiff's First Set of Requests for Production to Defendant Timothy Nye,  
20. dated December 12, 2023.

21. 10. Plaintiff's First Set of Requests for Admissions to Defendants Doe Officers  
22. III-VII, dated December 12, 2023.

23. 11. Plaintiff's First Set of Requests for Admissions to Defendant Gabriel Lea,  
24. dated December 12, 2023.

25. 12. Plaintiff's First Set of Requests for Admissions to Defendant Gene  
26. Wolfanger, dated December 12, 2023.

27. 13. Plaintiff's First Set of Requests for Admissions to Defendant George Ajam,  
28. dated December 12, 2023.

1           14. Plaintiff's First Set of Requests for Admissions to Defendant Israel Cruz  
2 Camacho, dated December 12, 2023.

3           15. Plaintiff's First Set of Requests for Admissions to Defendant Kelley Furnas,  
4 dated December 12, 2023.

5           16. Plaintiff's First Set of Requests for Admissions to Defendant Timothy Nye,  
6 dated December 12, 2023.

7           17. Plaintiff's First Set of Interrogatories to Defendants Doe Officers III-VII,  
8 dated December 12, 2023.

9           18. Plaintiff's First Set of Interrogatories to Defendant Gabriel Lea, dated  
10 December 12, 2023.

11           19. Plaintiff's First Set of Interrogatories to Defendant Gene Wolfanger, dated  
12 December 12, 2023.

13           20. Plaintiff's First Set of Interrogatories to Defendant George Ajam, dated  
14 December 12, 2023.

15           21. Plaintiff's First Set of Interrogatories to Defendant Israel Cruz Camacho,  
16 dated December 12, 2023.

17           22. Plaintiff's First Set of Interrogatories to Defendant Kelley Furnas, dated  
18 December 12, 2023.

19           23. Plaintiff's First Set of Interrogatories to Defendant Timothy Nye, dated  
20 December 12, 2023.

21           24. Plaintiff's Responses to Defendant Gabriel Lea's First Set of  
22 Interrogatories, dated May 29, 2024.

23           25. Plaintiff's Responses to Defendant Gene Wolfanger's First Set of  
24 Interrogatories, dated May 29, 2024.

25           26. Plaintiff's Responses to Defendant George Ajam's First Set of  
26 Interrogatories, dated May 29, 2024.

27           27. Plaintiff's Responses to Defendant Israel Cruz Camacho's First Set of  
28 Interrogatories, dated May 29, 2024.

1           28. Plaintiff's Responses to Defendant Kelley Furnas's First Set of  
2 Interrogatories, dated May 29, 2024.

3           29. Plaintiff's Responses to Defendant Timothy Nye's First Set of  
4 Interrogatories, dated May 29, 2024.

5           30. Plaintiff's Responses to Defendant LVMPD's First Set of Interrogatories,  
6 dated May 29, 2024.

7           31. Plaintiff's Responses to Defendant LVMPD's First Set of Requests for  
8 Production of Documents, dated May 29, 2024.

9           **B. DEFENDANTS' DISCOVERY**

10           1. Defendants' Initial List of Witnesses and Documents Pursuant to Fed. R.  
11 Civ. P. 26.1 dated August 30, 2023.

12           2. Defendant LVMPD's responses to Plaintiff's First Set of Requests for  
13 Production of Documents, dated November 27, 2023.

14           3. Defendant Gabriel Lea's responses to Plaintiff's First Set of Requests for  
15 Admission, dated January 25, 2024.

16           4. Defendant Gene Wolfanger's responses to Plaintiff's First Set of Requests  
17 for Admission, dated January 25, 2024.

18           5. Defendant George Ajam's responses to Plaintiff's First Set of Requests for  
19 Admission, dated January 25, 2024.

20           6. Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of  
21 Requests for Admission, dated January 25, 2024.

22           7. Defendant Kelly Furnas' responses to Plaintiff's First Set of Requests for  
23 Admission, dated January 25, 2024.

24           8. Defendant Timothy Nye's responses to Plaintiff's First Set of Requests for  
25 Admission, dated January 25, 2024.

26           9. Defendants Doe Officers III – VII's responses to Plaintiff's First Set of  
27 Requests for Admission, dated January 25, 2024.

1           10.    Defendant Gabriel Lea's responses to Plaintiff's First Set of Requests for  
2 Production of Documents, dated January 31, 2024.

3           11.    Defendant George Ajam's responses to Plaintiff's First Set of Requests for  
4 Production of Documents, dated January 31, 2024.

5           12.    Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of  
6 Requests for Production of Documents, dated January 31, 2024.

7           13.    Defendant Timothy Nye's responses to Plaintiff's First Set of Requests for  
8 Production of Documents, dated January 31, 2024.

9           14.    Defendants Doe Officers III-VII's responses to Plaintiff's First Set of  
10 Requests for Production of Documents, dated January 31, 2024.

11           15.    Defendant Gabriel Lea's responses to Plaintiff's First Set of Interrogatories,  
12 dated January 31, 2024.

13           16.    Defendant George Ajam's responses to Plaintiff's First Set of  
14 Interrogatories, dated January 31, 2024.

15           17.    Defendant Israel Cruz Camacho's responses to Plaintiff's First Set of  
16 Interrogatories, dated January 31, 2024.

17           18.    Defendant Timothy Nye's responses to Plaintiff's First Set of  
18 Interrogatories, dated January 31, 2024.

19           19.    Defendants Doe Officers III – VII's responses to Plaintiff's First Set of  
20 Interrogatories, dated January 31, 2024.

21           20.    Defendant LVMPD's First Set of Interrogatories to Plaintiff, dated February  
22 9, 2024.

23           21.    Defendant LVMPD's First Set of Requests for Production to Plaintiff, dated  
24 February 9, 2024.

25           22.    Defendant Gabriel Lea's First Set of Interrogatories to Plaintiff, dated  
26 February 9, 2024.

1           23.    Defendant Gene Wolfanger's First Set of Interrogatories to Plaintiff, dated  
2 February 9, 2024.

3           24.    Defendant George Ajam's First Set of Interrogatories to Plaintiff, dated  
4 February 9, 2024.

5           25.    Defendant Israel Cruz Camacho's First Set of Interrogatories to Plaintiff,  
6 dated February 9, 2024.

7           26.    Defendant Kelly Furnas' First Set of Interrogatories to Plaintiff, dated  
8 February 9, 2024.

9           27.    Defendant Timothy Nye's First Set of Interrogatories to Plaintiff, dated  
10 February 9, 2024.

11           **2.    DISCOVERY THAT REMAINS TO BE COMPLETED.**

12           The Parties' primary remaining discovery tasks include: (1) addressing any  
13 remaining meet and confer issues and finishing written discovery; and (2) scheduling of  
14 depositions. As discussed at the January 7, 2025, hearing regarding this matter, counsel need  
15 to schedule the depositions of the Parties and LMVPD's person most knowledgeable  
16 regarding its policies.

17           **3.    SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

18           This is the eighth request for an extension of discovery deadlines in this matter. The  
19 Parties request that the Discovery Plan and Scheduling Order deadlines be extended an  
20 additional ninety (90) days so that the Parties may complete the tasks above.

21           Based on the foregoing stipulation and proposed deadlines plan, as well as the  
22 representations made at the January 7, 2025, hearing in this matter, the Parties thus  
23 respectfully request an extension of time to extend the discovery in this matter to enable to  
24 them to conduct necessary discovery in this matter and so that this matter is fairly resolved  
25 on the merits.

#### 4. PROPOSED DEPOSITION DATES

Pursuant to this Court's request at the January 7, 2025, hearing, counsel have met and conferred, and propose the following deposition dates which will be noticed upon granting of the instant stipulation and order. Parties reserve the right to change these dates subject to deponent and counsel availability.

<b>Deponent</b>	<b>Proposed Deposition Date</b>
Defendant Timothy Nye	<b>February 20, 2025</b>
Defendant George Ajam	<b>February 20, 2025</b>
Defendant Gene Wolfanger	<b>February 21, 2025</b>
Defendant Kelley Furnas	<b>February 21, 2025</b>
Defendant Israel Cruz Camacho	<b>March 10, 2025</b>
Defendant Gabriel Lea	<b>March 10, 2025</b>
Defendant LMVPD FRCP 30(b)(6) Designee	<b>March 11, 2025</b>
Plaintiff Travis Nutsch	<b>March 12, 2025</b>

## 5. PROPOSED SCHEDULE FOR REMAINING DEADLINES

<b>Deadline</b>	<b>Current Deadline (ECF No. 20)</b>	<b>Proposed New Deadline</b>
Amend Pleadings and Add Parties	Passed	unchanged
Initial Expert Disclosures	Passed	unchanged
Rebuttal Expert Disclosures	Passed	unchanged
Discovery Cut-Off	February 6, 2025	<b>May 7, 2025</b>
Dispositive Motions	March 10, 2025	<b>June 9, 2025<sup>1</sup></b>
Joint Pretrial Order	April 7, 2025	<b>July 7, 2025<sup>2</sup></b>

<sup>1</sup> 90 days from March 10, 2025, is June 8, 2025, a Sunday.

<sup>2</sup> 90 days from April 7, 2025, is July 6, 2025, a Sunday.

1           Based on the foregoing stipulation and proposed deadlines plan, the Parties request  
 2 that the Discovery Plan and Scheduling Order deadlines be extended an additional ninety  
 3 (90) days so that the parties may conduct necessary discovery.

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5 **IT IS SO STIPULATED.**

6

7 Dated this 21st day of January, 2025.

Dated this 21st day of January, 2025.

8 **MCLETCHIE LAW**

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*Attorney for LVMPD Defendants*

17 **ORDER**

18 **IT IS SO ORDERED.**

19  
 20  
 21 **U.S. MAGISTRATE JUDGE**  
 22 1-22-25  
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